

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*

*

Plaintiffs,

*

v.

* Civil Action No.: 1:22-cv-00865-SAG

ANNE ARUNDEL COUNTY, MD

*

Defendant.

*

* * * * *

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO
THE COMPLAINT, COUNTY'S REQUEST FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER,
AND REQUEST FOR SCHEDULING CONFERENCE**

NOW COMES Defendant, Anne Arundel County, Maryland ("County"), by and through undersigned counsel, and with the consent of counsel for the Plaintiffs as to the extension to respond to the Complaint only, files this consent motion for extension of time to respond to the Complaint, request for extension of time to respond to Plaintiffs' Motion for Temporary Restraining Order, and request for a scheduling conference, and states for cause to this Honorable Court:

1. The County was served with the Complaint and Summons on or about April 12, 2022. The County consented to service by email.
2. The County's response to the Complaint is currently due on May 3, 2022.
3. Because of the complexity of the claims asserted in the Complaint, along with Plaintiffs' Motion for Preliminary Injunction and Temporary Restraining Order, or in the

Alternative, for Summary Judgment filed on April 20, 2022 and other unrelated pressing matters, undersigned counsel requested a brief extension from Counsel for Plaintiffs to respond to the Complaint until May 13, 2022, to which Plaintiffs' counsel agreed. The County believed that once it responded to the Complaint on May 13, 2022, the Court would set a briefing schedule for the remainder of the motions.

4. On April 21, 2022, this Court entered an order requiring County to respond to Plaintiff's Motion for Temporary Restraining Order by April 29, 2022. ECF No. 7.

5. On April 25, 2022, counsel for the County requested consent from counsel for Plaintiffs to file its response to all of Plaintiffs' motions, including Plaintiffs' Motion for Temporary Restraining Order on the same date as the County's response to the Complaint, May 13, 2022. The requested extension would permit all responses from the County to be filed on the same date. The parties and the Court would be better served by having the full briefing addressing all issues in the case in hand at one time.

6. While counsel for Plaintiffs consented to County's filing its response to the Complaint on May 13, 2022, Plaintiffs object to and do not consent to the County's request for an extension of time to respond to Plaintiffs' Motion for Temporary Restraining Order until that same date.

7. Plaintiffs complain that under the provision of the recently passed bill that they are required to distribute suicide prevention and conflict resolution brochures to purchasers of guns and ammunition. Complaint at ¶¶ 1-2.

8. No prior request for an extension has been made and Plaintiffs will be minimally affected by granting this request as to all pending responses being filed together on May 13, 2022.

9. It would not be an abuse of discretion by this Court to grant the County additional time until May 13, 2022 to respond to the Complaint and all pending Plaintiffs' motions at the same time. It would serve judicial economy and permit a fuller and fair examination by the Court of the complex issues at play in this case.

WHEREFORE, Defendant Anne Arundel County, Maryland respectfully requests that the Court grant this motion and allow the County to file its response to the Complaint on or before May 13, 2022 (consented to by Plaintiffs), permit the County to file its responses to Plaintiffs' Motion for a Preliminary Injunction and Temporary Restraining Order, and Plaintiffs' Alternative Motion for Summary Judgment on or before May 13, 2022, set a Scheduling Conference, and such other and further relief as justice and its cause may require.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of April, 2022, the foregoing motion was electronically filed in the United States District Court for the District of Maryland.

Tamal A. Banton

Tamal A. Banton